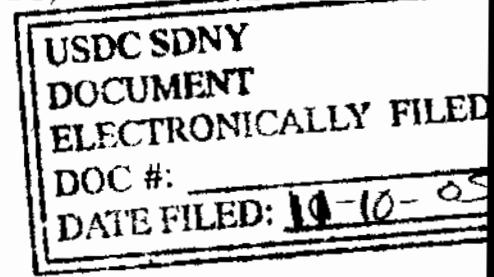


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In Re: TERRORIST ATTACKS OF
SEPTEMBER 11, 2001

)
) 03 MDL 1570 (RCC)
) ECF CASE
)
) 04 CV 1076
) 04 CV 1923
)
)
)



**NOTICE OF MOTION FOR PRO HAC VICE ADMISSION
OF AMY BERMAN JACKSON**

PLEASE TAKE NOTICE that upon the annexed declarations of David U. Gourevitch and Amy Berman Jackson, and the exhibits thereto, Defendants Martin Wachter, Erwin Wachter, Sercor Treuhand Anstalt, and Asat Trust Reg. will move this Court at a date and at such a time as may be designated by the Court in the United States Courthouse at 500 Pearl Street, New York, NY 10007 for an Order pursuant to Local Civil Rule 1.3(c) of this Court for the *pro hac vice* admission of Amy Berman Jackson to appear before this Court as counsel for Martin Wachter, Erwin Wachter, Sercor Treuhand Anstalt, and Asat Trust Reg.

October 21, 2005

Respectfully submitted,

A handwritten signature in black ink that appears to read "David Gourevitch".

David U. Gourevitch (DG8795)
Law Office of David Gourevitch
Tower 56, Second Floor
126 East 56th Street
New York, NY 10022
Tel.: (212) 355-1300
Fax: (212) 355-1531

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In Re: **TERRORIST ATTACKS OF
SEPTEMBER 11, 2001**

)) 03 MDL 1570 (RCC)
)) ECF CASE
))
)) 04 CV 1076
)) 04 CV 1923
))
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))

**DECLARATION OF DAVID U. GOUREVITCH IN SUPPORT
OF THE MOTION OF DEFENDANTS MARTIN WACHTER, ERWIN
WACHTER, SERCOR TREUHAND ANSTALT, AND ASAT TRUST REG.
FOR *PRO HAC VICE* ADMISSION OF AMY BERMAN JACKSON**

I, DAVID U. GOUREVITCH, declare as follows:

1. I am a partner in the Law Office of David Gourevitch, P.C., counsel for defendants Martin Wachter, Erwin Wachter, Sercor Treuhand Anstalt, and Asat Trust Reg., and I am duly admitted to practice before this Court and the courts of the State of New York.
2. I submit this declaration in support of the motion under Local Civil Rule 1.3(c) for the *pro hac vice* admission of Amy Berman Jackson to appear before this Court as attorney for defendants Martin Wachter, Erwin Wachter, Sercor Treuhand Anstalt, and Asat Trust Reg. in this action.
3. In connection with this application, I submit as Exhibit B Ms. Jackson's declaration in which she describes her experience and familiarity with the Judicial Code governing practice in the United States District Courts, Federal Rules of Civil Procedure, Federal Rules of Evidence, and Local Rules governing practice in this Court. Attached to

Ms. Jackson's declaration are certificates of good standing issued within the past 30 days from the District of Columbia and Virginia.

4. For the foregoing reasons, I respectfully request the *pro hac vice* admission of Amy Berman Jackson in this action. For the Court's convenience, a proposed order granting the motion to admit Ms. Jackson *pro hac vice* is attached as Exhibit A.

I declare under penalty of perjury under the laws of the Southern District of New York that the foregoing is true and correct.

New York, NY
October 21, 2005

David Gourevitch

David U. Gourevitch (DG8795)
Law Office of David Gourevitch, P.C.
Tower 56, Second Floor
126 East 56th Street
New York, NY 10022
Tel.: (212) 355-1300
Fax: (212) 355-1531

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In Re: TERRORIST ATTACKS OF
SEPTEMBER 11, 2001

)
) 03 MDL 1570 (RCC)
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)
) 04 CV 1076
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)

ORDER ADMITTING COUNSEL PRO HAC VICE

This matter having been brought before the Court by Martin Wachter, Erwin Wachter, Sercor Treuhand Anstalt, and Asat Trust Reg., by motion pursuant to Local Civil Rule 1.3(c) of this Court for the *pro hac vice* admission of Amy Berman Jackson, on notice to all parties of record hereto, and the Court having reviewed and considered the papers filed in support of this Motion, it is hereby

ORDERED that Amy Berman Jackson be and hereby is admitted *pro hac vice* in connection with this action and that she shall abide by the provisions of the Local Rules of this Court in all respects and be subject to the disciplinary jurisdiction of the Court in accordance with Local Rule 1.5.

SO ORDERED.

The Honorable Richard Conway Casey
United States District Judge 11-9-05

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In Re: TERRORIST ATTACKS OF)
SEPTEMBER 11, 2001) 03 MDL 1570 (RCC)
) ECF CASE
)
) 04 CV 1076
) 04 CV 1923
)
)
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)

**DECLARATION OF AMY BERMAN JACKSON IN SUPPORT
OF THE MOTION OF DEFENDANTS MARTIN WACHTER, ERWIN
WACHTER, SERCOR TREUHAND ANSTALT, AND ASAT TRUST REG.
FOR *PRO HAC VICE* ADMISSION OF BARRY COBURN AND AMY BERMAN
JACKSON**

I, Amy Berman Jackson, declare as follows:

1. I am a partner in the law firm of Trout Cacheris, PLLC, co-counsel for defendants Martin Wachter, Erwin Wachter, Sercor Treuhand Anstalt, and Asat Trust Reg. My current office address is 1350 Connecticut Avenue, N.W., Suite 300, Washington, D.C. 20036.
2. I submit this declaration in support of the motion under Local Civil Rule 1.3(c) for my *pro hac vice* admission to appear before this Court as an attorney for defendants Martin Wachter, Erwin Wachter, Sercor Treuhand Anstalt, and Asat Trust Reg. in this action.
3. I have been admitted to practice law in the District of Columbia since December 17, 1979. As shown in the Certificate of Good Standing attached to this declaration as Exhibit 1, I am currently a member in good standing of the Bar of the District of Columbia. I have been admitted to practice law in Virginia since September 4, 1986. As

shown in the Certificate of Good Standing attached to this declaration as Exhibit 2, I am currently a member in good standing of the Virginia State Bar.

4. I have been admitted to practice before the highest court of the District of Columbia and in the following federal courts: United States District Court for the District of Columbia; United States District Court for the District of Maryland; and United States District Court for the Eastern District of Virginia. I am also admitted to practice before the United States Court of Appeals for the Fourth, Fifth and District of Columbia Circuits.

5. There are no pending disciplinary proceedings against me in any state or federal court.

6. I have read and am familiar with: (a) the provisions of the Judicial Code which pertain to the jurisdiction of, and the practice in, the United States District Courts; (b) the Federal Rules of Civil Procedure; (c) the Federal Rules of Criminal Procedure; and (d) the Local Rules of the United States District Court for the Southern and Eastern Districts of New York.

7. I will faithfully adhere to all rules applicable to my conduct in connection with any activities of this Court.

I declare under penalty of perjury that the foregoing is true and correct.

Washington, D.C.
October 17, 2005



Amy Berman Jackson

EXHIBIT 1



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D.C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia
Court of Appeals, do hereby certify that

AMY BERMAN JACKSON

was on the 17 day of DECEMBER, 1979

duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on
September 27, 2005.

CARLAND PINKSTON, JR., CLFRK

By: A. Jackson
Deputy Clerk

EXHIBIT 2

Barbara V. Anderson, President
 Leigh Anderson & Peake, P.C.
 24 Frank M. Road
 P.O. Box 240
 Roanoke, Virginia 24016-0240
 Telephone: (540) 772-4661

Karen A. Gould, President-Elect
 Childress, Gould & Russell, P.C.
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 Richmond, Virginia 23230
 Telephone: (804) 755-2415

David D. Bobzien, Immediate Past President
 222 Durand Drive
 Richmond, Virginia 23236-3312
 Telephone: (757) 324-2623

Barbara Ann Williams
 Bar Counsel



Thomas A. Edmonds,
 Executive Director and
 Chief Operating Officer

Mary Frances Spencer
 Deputy Executive Director

Elizabeth T. Keller
 Assistant Executive Director
 for Bar Services

Susan C. Busch
 Assistant Executive Director
 for Administration

Virginia State Bar

Eighth and Main Building
 707 East Main Street, Suite 1500
 Richmond, Virginia 23219-2800
 Telephone: (804) 775-0500

Fax: (804) 775-0501 TDD: (804) 775-0502

September 28, 2005

CERTIFICATE OF GOOD STANDING

**THIS IS TO CERTIFY THAT AMY BERMAN JACKSON IS AN
 ACTIVE MEMBER OF THE VIRGINIA STATE BAR IN GOOD STANDING.**
**MRS. JACKSON WAS LICENSED TO PRACTICE LAW IN VIRGINIA ON
 SEPTEMBER 4, 1986, AFTER ADMISSION ON MOTION THROUGH THE
 SUPREME COURT OF VIRGINIA.**

SINCERELY,

Thomas A. Edmonds

**THOMAS A. EDMONDS
 EXECUTIVE DIRECTOR AND
 CHIEF OPERATING OFFICER**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In Re: TERRORIST ATTACKS OF
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03 MDL 1570 (RCC)
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Notice of Motion for Pro Hac Vice Admission of Amy Berman Jackson, Declaration of David U. Gourevitch In Support of the Motion of Martin Wachter, Erwin Wachter, Sercor Treuhand Anstalt, and Asat Trust Reg. For Pro Hac Vice Admission of Amy Berman Jackson, Declaration of Amy Berman Jackson In Support of the Motion of Martin Wachter, Erwin Wachter, Sercor Treuhand Anstalt, and Asat Trust Reg. For Pro Hac Vice Admission, and Proposed Order was served upon all counsel of record by mail on the 21st day of October, 2005.

LAW OFFICE OF DAVID GOUREVITCH, P.C.

David Gourevitch

David U. Gourevitch (DG8795)
Law Office of David Gourevitch, P.C.
Tower 56, Second Floor
126 East 56th Street
New York, NY 10022
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